

REMARKS/ARGUMENTS

In view of the foregoing amendments and the following remarks, the applicants respectfully submit that the pending claims are not rendered obvious under 35 U.S.C. § 103. Accordingly, it is believed that this application is in condition for allowance. If, however, the Examiner believes that there are any unresolved issues, or believes that some or all of the claims are not in condition for allowance, the applicants respectfully request that the Examiner contact the undersigned to schedule a telephone Examiner Interview before any further actions on the merits.

The applicants will now address each of the issues raised in the outstanding Office Action.

Rejections under 35 U.S.C. § 103

Claims 11-19 and 30-34 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 7,031,252 ("the Hosler patent"). The applicants respectfully request that the Examiner reconsider and withdraw this ground of rejection in view of the following.

Independent claim 11, as amended, is not rendered obvious by the Hosler patent at least because the Hosler patent neither teaches, nor suggests, an act of ***providing, with the current standby routing facility when it is in a state of being the standby routing facility, network information to the external node in accordance***

with a routing protocol, wherein the external node runs a routing protocol peering with a routing protocol run by the router. Support for the amendments to claim 11 is provided, for example, by paragraphs [0044]-[0049] (especially paragraph [0044]) of the present application.

In the Hosler patent, a working interface 214 and a protect interface 216 communicate with a Sonet/SDH add drop multiplexer ("ADM") 210. Specifically, the Hosler patent states:

According to the SONET/SDH specifications for a 1+1 linear APS or MSP system, any data transmitted to ADM 210 from ADM 212 is transmitted to working interface 214 housed in router 202 and to the protect interface 216 also housed in router 201. Likewise, ADM 212 transmits data to the remote working interface 218, and to remote protect interface 220, both housed in router 209. A SONET network implementing APS uses bytes K1 and K2 in the line overhead portion of the frame to identify the interface, either working or protect, from which an ADM is currently receiving data. Thus, for example, **ADM 210** bridges all transmissions equally to two separate interfaces, working interface 214 and protect interface 216, but **"listens" to only one of the two interfaces**. The working and protect interfaces 214 and 216 are managed by logic running in the router containing the protect interface, such as router 201, which contains protect interface 216. **The APS logic activates for transmitting only the interface currently selected for "listening" by the ADM. The non-selected interface is held in a "Protocol Down" state by the router to prevent transmission of data packets on**

the circuit. For example, if ADM 210 selects the working interface 214, the APS logic in router 201 commands router 202 to activate the working interface 214. Regardless of whether a protect interface or a working interface is currently selected, the protect interface 216 conducts an ongoing protocol dialog with ADM 210, using SONET bytes K1 and K2 or appropriate SDH bytes in the line overhead. [Emphasis added.]

(Column 6, lines 12-39) Thus, although the working interface 214 and protect interface 216 have a "protocol dialog" with the ADM 210, this is not a "routing protocol". That is, the ADM 210 does not run a routing protocol peering with a routing protocol in the router. Further, although the ADM 210 **sends** information to both the working interface 214 and the protect interface 216, it **"listens to"** and **transmits** only the interface currently selected (the working interface 214). The non-selected interface (the protect interface 216) is held in a "Protocol Down" state by the router 201 to prevent transmission of data packets on the circuit.

As can be appreciated from the foregoing, claim 11, as amended, is not rendered obvious by the Hosler patent. Claim 19 is similarly not rendered obvious by the Hosler patent. Independent claims 16 and 18, as amended, are similarly not rendered obvious by the Hosler patent. Since claims 12-15, 31 and 32 directly or indirectly depend from claim 11, and since claims 17, 30, 33 and 34 directly or indirectly depend from claim 16, these claims are similarly not rendered obvious by the Hosler patent.

Also, dependent claim 13 further recites that the act of informing an external node that the router has redundant routing facilities includes generating and transmitting a message including an identification of the router, an address of the currently designated routing facility, and an address of the current standby routing facility. The Examiner contends that column 6, lines 18-22 of the Hosler patent describes that the interfaces are identified as working or protect to the ADM. (See Paper No. 20080317, page 3.) The Examiner then contends that each interface **is associated with** an IP destination address since each router contains different interfaces for different network destinations, citing column 5, line 64 through column 6, line 5, and column 7, lines 14-16 of the Hosler patent. (See Paper No. 20080317, pages 3 and 4.) However, the fact that a router may have a routing table that associates outgoing interfaces with destination network addresses es does not teach or suggest **transmitting a message including** an identification of the router, an address of the currently designated routing facility, and an address of the current standby routing facility. Thus, dependent claim 13 is not rendered obvious by the Hosler patent for at least this additional reason.

Also, dependent claim 14 further recites that the act of informing an external node that the router has redundant routing facilities uses an existing BGP message format. The Examiner cites column 5, line 64 through column 6, line 5 of the Hosler patent as teaching this feature. (See Paper No. 20080317, page 4.) However, merely stating that a router can **run the BGP protocol**

does not teach or suggest using an existing BGP message format to **inform an external node that the router has redundant routing facilities**. Thus, dependent claim 14 is not rendered obvious by the Hosler patent for at least this additional reason.

Allowable subject matter

Pending claims 20-28, 35 and 36 are allowed.

Conclusion

In view of the foregoing amendments and remarks, the applicants respectfully submit that the pending claims are in condition for allowance. Accordingly, the applicants request that the Examiner pass this application to issue.

Any arguments made in this amendment pertain **only** to the specific aspects of the invention **claimed**. Any claim amendments or cancellations, and any arguments, are made **without prejudice to, or disclaimer of**, the applicants' right to seek patent protection of any unclaimed (e.g., narrower, broader, different) subject matter, such as by way of a continuation or divisional patent application for example.

Respectfully submitted,

June 3, 2008



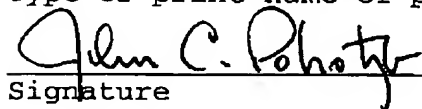
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